

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

ROMAN V. SELEZNEV,

Defendant.

NO. CR11-0070RAJ

**GOVERNMENT'S SECOND
AMENDED EXHIBIT LIST**

The United States of America, through Annette L. Hayes, United States Attorney for the Western District of Washington, and Norman Barbosa and Seth Wilkinson, Assistant United States Attorneys, and Harold Chun, Trial Attorney, hereby submits this amended list of exhibits it may present in its case-in-chief. The United States reserves the right to amend this list or to offer additional exhibits as impeachment or rebuttal material.

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Ex No.	Description	Admitted
	Victim Intrusion Forensic Evidence	
1.1	Forensic Evidence Extract : Schlotsky's	
1.2	Forensic Evidence Extract: Broadway Grill	
1.3	Forensic Evidence Extract Mad Pizza First Hill	
1.4	Forensic Evidence Extract: Mad Pizza Madison Park	
1.5	Forensic Evidence Extract: Mad Pizza Starfire	
1.6	Forensic Evidence Extract: Mad Pizza SLU	
1.7	Forensic Evidence Extract: Casa Mia	
1.8	Forensic Evidence Extract: Grand Central Baking	
1.9	Forensic Evidence Extract: Village Pizza	
1.10	Forensic Evidence Extract: Red Pepper Pizza	
1.10a	Video Demo of Red Pepper Pizza (Bulk Exhibit)	
1.11	Track Data From File From Red Pepper Pizza	
1.12	Extract of RSCA (Malware) Hardcode	
1.13	Screenshot of Kameo Properties	
1.14	Photos of Responses to Seattle Victims	
1.15	Summary of Malware Installation and Mitigation	
	Screen Shots from Bulba.cc	
2.1	Bulba.cc Front Page	
2.2	Track2.name Front Page	
2.3	Bulba.cc advertisement posts	
2.4	Bulba.cc search page	
2.5	Bulba.cc notification of "new feature"	
2.6	Video of Bulba Website (Bulk Exhibit)	
2.7	Bulba.cc Order Screen	
2.8	Bulba.cc Bin List	
2.9	Undercover Purchase, Order ID 86653, on Bulba.cc 4/12/2011	
2.10	Bulba.cc Support Ticket #21250	
2.11	Bulba.cc Support Ticket #20524	
2.12	Bulba.cc Support Ticket #20672	
2.13	Bulba.cc Support Ticket #24101	
2.14	Bulba.cc Support Ticket #25258	
2.15	Bulba.cc Support Ticket #27497	
2.16	Reserved	
2.17	Bulba.cc Announcement that Shop is Closing on January 7, 2012	

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1		Items From Hop One Server	
2	3.1	Log File "Active Logs" from HopOne Server Listing dump files by victim IP address	
3	3.1a	RESERVED	
4	3.1b	RESERVED	
5	3.1c	RESERVED	
6	3.2	Full log file for Mad Pizza Starfire	
7	3.3	Full log file for Village Pizza	
8	3.4	Internet history re: visits to shmak.fvds.ru	
9	3.5	Internet history re visits to secure.bulba.cc	
10	3.6	Internet history re: visits to secure.track2.name	
11	3.7	Internet history re: visits to track2vip.tv	
12	3.8	Internet history re: visits to Ozon.ru	
13	3.9	Internet history re: visit to fibotrade.pro.com	
14	3.10	Internet history re: Bing searches for "Track2.tv" and "Track2vip.tv"	
15	3.11	Internet history re: carder.biz	
16	3.12	Cached web page from carder.biz	
17	3.13	Reserved	
18	3.14	Cached web page from carder.biz	
19	3.15	Cached web page from ebaytoday.ru account for Roman Seleznev	
20	3.15a	Translation of 3.15	
21	3.16	Cached web page from Ozon.ru	
22	3.16a	Translation of Ex 3.16	
23	3.17	Cached web page from Ozon.ru	
24	3.17a	Translation of 3.17	
25	3.18	RDP File from My Documents folder on HopOne Server with Finger Lakes Premier Properties IP address	
26	3.19	Page File Data re: romariogro1@mail.ru	
27	3.20	Page File Itinerary for Roman Seleznev flight from Moscow to Bali	
28	3.21	Page File Data re: Roman Seleznev	
	3.22	Page File Data Re: Roman Seleznev, Alexander Khohlachev, Alexey Smulskiy and Svetlana Smulskaya	
	3.23	Page File Data Re: Svetlana Selezneva, Eva Selezneva, et al	
	3.24	Page File Data with flight-itinerary receipt for "Seleznev" and "Gaponov"	
	3.25	Page File Data Re: Roman Seleznev Svetlana Selezneva, Alexander Khohlachev, and Sergei Nikulnikov	
	3.26	Page File Data Re: Svetlana Smulskaya, Alexey Smulskiy, Natalia Stepnova, and Eva Selezneva	
	3.27	Reserved	
	3.28	Reserved	
	3.29	Hop One Server Drives (Bulk Exhibit)	
	3.30	Hacking Tools from Hop One Server	
	3.31	Hop One Event Logs – Indonesia	

1	4	Domain Registration Records	
2	4.1	Domain Registration for ncux.name	
3	4.1a	Domain Tools 902 Certification	
4	4.2	Domain Registration for ncux.asia	
5	4.3	Domain Registration for ncux.tv	
6	4.4	Domain Registration for Bulba.cc	
7	4.5	Domain Registration for Track2.name	
8	4.6	Domain Registration for 2pac.cc	
9	4.7	Domain Registration Record for PosDumps.com	
10	4.8	Domain Registration for Track2.tv	
11	4.9	Domain Registration for Track2vip.tv	
12	4.10	Domain Registration for Track2.cc	
13	4.11	Bulba.cc and Track2.name Reverse IP Lookup	
14	4.12	Track2 and Bulba Domain Registration Summary	
15	4.13	shmak.fvds.ru Traceroute	
16	4.14	nCuX Domain Registration Summary	
17		Emails—Boookscafe@yahoo.com	
18	5.1	Yahoo! Business Records reflecting creation of Yahoo! account boookscafe@yahoo.com!	
19	5.1a	Yahoo! 902 Certification	
20	5.2	Yahoo! login records for boookscafe	
21	5.3	E-mails from ssav25@rambler.ru to boookscafe@yahoo.com	
22	5.3a	Translation of 5.3	
23	5.4	E-mails addressed to Roman Seleznev from V Kontakte:	
24	5.4a	Translations of Exhibit 5.4	
25	5.5	E-mail addressed to Roman Seleznev from Stils.ru	
26	5.5a	Translation of 5.5	
27	5.6	E-mails addressed to Roman Seleznev from Sendflowers.ru	
28	5.6a	Translations of Exhibit 5.6	
	5.7	E-mail from Internet Store Defencer.ru to Roman Seleznev re: Order 607	
	5.7a	Translation of 5.7	
	5.8	E-mails re: login or user name smaas	
	5.8a	Translation of 5.8	
	5.9	E-mail addressed to nCuX	
	5.9a	Translation of 5.9	
	5.10	E-mails from Reggi.ru Robot	
	5.10a	Translations of Exhibit 5.10	
	5.11	E-mails from FirstVDS	
	5.11a	Translation of Exhibit 5.11.1	
	5.12	E-mails from FirstVDS	
	5.13	E-mail to f32yaris@yahoo.com	
	5.14	E-mail to Christof Paar	
	5.15	E-mails between "Rick Colho" and boookscafe@yahoo.com r	

1	5.16	E-mail from Pokerstars.net	
2	5.16a	Translation of 5.16	
3	5.17	E-mail from AmF.ru	
4	5.17a	Translation of 5.17	
5		Emails—Rubensamvelich@yahoo.com	
6	6.1	Yahoo Business Records reflecting creation of Yahoo! account rubensamvelich@yahoo.com	
7	6.1a	Yahoo 902 Certification	
8	6.2	Login History for RSV Account	
9	6.3	Paypal Emails	
10	6.3a	Translation of 6.3a	
11	6.4	NuSphere Emails	
12	6.5	Email from Prolexic	
13	6.6	Itunes Purchase Emails	
14	6.7	Emails evidencing use of “smaus” and “ochko”	
15	6.8	Email re: Smaus	
16	6.8a	Translation of Exhibit 6.8	
17	6.9	Email from Reggi.ru confirming registration of Track2.tv domain	
18	6.9a	Translation of Exhibit 6.9	
19	6.10	Web Names Emails	
20	6.10a	Translation of 6.10	
21	6.11	RusTelekom Emails	
22	6.12	Reserved	
23	6.13	BlackLotus Emails	
24	6.14	HostTracker Emails	
25	6.14a	Translations of Exhibit 6.14	
26	6.15	Liberty Reserve Emails	
27	6.16	Messages to Track2 from Carder.su	
28	6.17	Purchase of multi-password recovery (cracker)	
	6.18	RESERVED	
	6.19	Email re: Liberty Reserve Account U9614915	
	6.20	Email re track2.name account	
	6.21	Email from ICQ Acct Service	
	6.22	Emails From Abuse@robodesk	
		Emails-Bulbacc@yahoo.com	
	7.1	Yahoo! Business Records reflecting creation of Yahoo! account bulbacc@yahoo.com	
	7.1a	Yahoo 902 Cert	
	7.2	Yahoo! login records for bulbacc	
	7.3	Emails from WebNames.Ru re: registration	
	7.3a	Translation of 7.3	
	7.4	E-mails from WebNames.Ru re: DNS servers	
	7.4a	Translations of Exhibit 7.4	

1		nCuX Forum Posts and Registrations	
2	8.1	nCuX Carder Planet Registration Record	
3	8.2	nCuX CardingWorld Registration Record	
4	8.3	nCuX DarkMarket Registration Record	
5	8.4	nCuX Carder.su Registration Record	
6	8.5	nCuX forum thread on Carder.su	
7	8.6	nCuX forum post on Carder.su	
8	8.7	nCuX forum post on CardingWorld	
9	8.7a	Translation of 8.7	
10		Track2 Forum Posts and Registrations	
11	8.8	Track2 Carder.su Profile Page 9/26/2009	
12	8.8a	Translation of 8.8	
13	8.9	Track2 Forum thread on Carder.su 9/26/2009	
14	8.9a	Translation of 8.9	
15	8.10	Track2 forum thread on Carder.su 12/4/2009	
16	8.11	Track2 forum post on Carde.su 5/20/2010	
17	8.12	Track2 forum post on Carder.su 6/7/2010	
18	8.13	Track2 forum post on Carder.su 7/21/2010	
19		2pac Forum Registrations	
20	8.14	2pac CarderPro Forum Registration	
21	8.15	2pac Crimes.ws Forum Registration	
22	8.16	2pac Verified Forum Registration	
23	8.17	2pac Vor.cc Forum Registration	
24		Liberty Reserve Records	
25	9.1	Registration Records for Liberty Reserve Account U8518741	
26	9.2	Registration Records for Liberty Reserve Account U0900959	
27	9.3	Registration Records for Liberty Reserve Account U9614915	
28	9.4	Registration Records for Liberty Reserve Account U0045772	
	9.5	Registration Records for Liberty Reserve Account U4208156	
	9.6	Reserved	
	9.7	Registration Records for Liberty Reserve Account U2286723	
	9.8	Registration Records for Liberty Reserve Account U1429380	
	9.9	Registration Records for Liberty Reserve Account U6282588	
	9.10	Liberty Reserve Transaction Records	
	9.11	Summary of Liberty Reserve Records	
	9.12	Liberty Reserve User IP History for Account U8518741	
	9.13	Liberty Reserve Transaction History for Account U8518741	
	9.14	Liberty Reserve User IP History for Account U0900959	
	9.15	Liberty Reserve User IP History for Account U9614915	
	9.16	Liberty Reserve Transaction History for Account U9614915 (Bulk Exhibit)	
	9.17	Liberty Reserve User IP History for Account U0045772	
	9.18	Liberty Reserve Transaction History for Account U0045772 (Bulk Exhibit)	

1	9.19	Liberty Reserve User IP History for Account U4208156	
2	9.20	Liberty Reserve Transaction History for Account U4208156	
3	9.21	Liberty Reserve User IP History for Account U2286723	
4	9.22	Liberty Reserve Transaction History for Account U2286723	
5	9.23	Liberty Reserve User IP History for Account U1429380	
6	9.24	Liberty Reserve Transaction History for Account U1429380	
7	9.25	Liberty Reserve User IP History for Account U6282588	
8	9.26	Liberty Reserve Transaction History for Account U6282588	
9		2Pac Screen Shots	
10	10.1	Screenshots from 7/8/14 Undercover	
11	10.2	Screenshots from 7/10/14 Undercover	
12	10.3	Screenshots From 8/14/14 Undercover	
13	10.4	Undercover purchase on 2PAC	
14	10.5	Dumps Purchased on 2PAC	
15	10.6	Additional Screenshots From 7/10/14 Undercover	
16	10.7	Postings on 2Pac Feedback Page	
17	10.7a	Translation of 10.7	
18	10.8	Screenshots from 2/23/14 Undercover	
19		Screen Shots from PosDumps.com	
20	11.1	Pages from site PosDumps.com	
21	11.2	Full POS Dumps website (Bulk Exhibit)	
22		Male Operation Photos	
23	12.1	Aerial Photographs of the Maldives	
24	12.2	Photographs of Seleznev Apprehension Operation	
25	12.3	Photograph of Maldives Immigration Record	
26	12.4	Photograph of Seleznev personal items	
27	12.5	Photo of Seized Credit Cards	
28	12.6	Seleznev's Internal Russian Federation Passport (Bulk Exhibit)	
	12.6a	Photos of Seleznev's Internal Russian Federation Passport	
	12.6b	Translation of Seleznev's Internal Russian Federation Passport	
	12.7	Seleznev's International Russian Federation Passport (Bulk Exhibit)	
	12.7a	Photos of Seleznev's International Russian Federation Passport	
	12.7b	Translation of Seleznev's International Russian Federation Passport	
	12.8	Laptop Seized From Seleznev (Bulk Exhibit)	
	12.8a	iPhone Seized from Seleznev (Bulk Exhibit)	
	12.8b	iPad Seized from Seleznev (Bulk Exhibit)	
	12.9	Miscellaneous Travel Documents, Receipts and Itineraries (Bulk Exhibit)	
	12.9a	Travel Reservation Document (Translation)	
	12.10	Photographs of Flight to Guam	

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1		Items from Roman's Seleznev's Laptop	
2	13.1	Image of Seleznev's Passport From Laptop	
3	13.1a	Metadata for 13.1	
4	13.2	Image of Seleznev's Credit Card	
5	13.2a	Metadata for 13.2	
6	13.3	Photos of Seleznev With Friends and Woman(2 pages)	
7	13.3a	Metadata for 13.3	
8	13.4	Photo of Seleznev with Wife and Daughter	
9	13.4a	Metadata for 13.4	
10	13.5	Invoice from Atmosphere Resort	
11	13.5a	Metadata for 13.5	
12	13.6	Animated 2Pac Ad from Desktop (Bulk Exhibit)	
13	13.6a	Metadata for 2Pac Ad	
14	13.7	RESERVED	
15	13.8	Image of Hosts File	
16	13.8a	Metadata for 13.8	
17	13.9	Report of Dump Files on Laptop	
18	13.10	Dump File: WA	
19	13.10a	Metadata for 13.10	
20	13.11	Dump File: 1000 Washington	
21	13.11a	Metadata for 13.11	
22	13.12	User Credentials File "1BACK14MAY.txt" (Text File Containing Login and Password Info)	
23	13.12a	User Credentials File "1BACKUP.txt.txt" (Text File Containing Login and Password Info)	
24	13.12b	Metadata for 13.12 and 13.12a	
25	13.12c	Translation of 13.12	
26	13.12d	Translation of 13.12a	
27	13.13	POS Dumps Website Template	
28	13.13a	Metadata for 13.13	
	13.14	Recovered image of POS Dumps Diagnostics	
	13.14a	Metadata for 13.14	
	13.15	Recovered Image of Bing Search for POS Dumps	
	13.15a	Metadata for 13.15	
	13.16	Recovered image of 2pac Whois diagnostics	
	13.16a	Metadata for 13.16	
	13.17	Recovered Image of 2Pac Login to InFraud	
	13.17a	Metadata for 13.17	
	13.18	Recovered Image of Omerta Website with 2Pac Ad	
	13.18a	Metadata for 13.18	
	13.19	Recovered Image of try2check.me	
	13.19a	Metadata for 13.19	
	13.20	Recovered Images of PACER searches	
	13.20a	Metadata for 13.20	

1	13.21	Chat with psych0tic	
2	13.21a	Metadata for 13.21	
3	13.22	Chat with bitcoingambler	
4	13.22a	Metadata for 13.22	
5	13.23	Chat with black.russian	
6	13.23a	Metadata for 13.23	
7	13.24	Chat with xxomax	
8	13.24a	Metadata for 13.24	
9	13.25	Chat with marysnow	
10	13.25a	Metadata for 13.25	
11	13.26	Chat with cpro	
12	13.26a	Metadata for 13.26	
13	13.27	Chat with hd@100500.cc	
14	13.27a	Metadata for 13.27	
15	13.28	Chat with JB	
16	13.28a	Metadata from 13.28	
17	13.29	Chat with JB	
18	13.29a	Metadata from 13.29	
19	13.30	Parsed Search Terms From Laptop	
20	13.31	Firefox Form History from Laptop	
21	13.32	Chat with Hohoho	
22	13.32a	Metadata for 13.32	
23	13.33	Screenshots of Restored Computer	
24	13.33a	Translation of 13.33	
25	13.34	Reserved	
26	13.35	Reserved	
27	13.36	Cybercrime and Doing Time	
28	13.36a	Metadata from 13.36	
	13.37	Chat With Burgled	
	13.37a	Metadata from 13.37	
	13.38	Chat With Vai2000	
	13.38a	Metadata from 13.38	
	13.39	Snapshot of Chat Applications	
	13.39a	Metadata for 13.39	
	13.40	Summary of Metadata for Laptop Exhibits	
	13.41	Chat With Zarmax	
	13.41a	Metadata for 13.31	
	13.42	USSS Certified Inventory of Evidence	
	13.43	USSS Evidence Vault Security Access Log	
	13.44	Encase Evidence Pane Screenshot	
	13.45	Firefox Web History re: POS Dumps	
	13.46	Firefox Stored Credentials	
	13.46a	Metadata for 13.36	

1		Items from Roman Seleznev's iPhone and iPad	
2	14.1	Images from iPhone	
3	14.1a	Translation of 14.1	
4	14.2	Reserved	
5	14.3	Two photographs of Roman Seleznev	
6	14.4	Photographs of Roman Seleznev Passports	
7	14.5	Photograph of chat session between "2PAC" and "CapitalZOne"	
8	14.5a	Translation of 14.5	
9	14.6	Reserved	
10	14.7	Reserved	
11	14.8	Reserved	
12	14.9	Reserved	
13	14.10	BTC-E e-mails to smaus	
14	14.10a	Translation of 14.10	
15	14.11	iPhone Emails reflecting use of "smaus" and "ochko" login and passwords	
16	14.11a	Translation of 14.11	
17	14.12	iPhone E-mails confirming reservation at Kanifushi Hotel	
18	14.12a	Translation of 14.12	
19	14.13	iPhone E-mails related to Bali, Indonesia property	
20	14.13a	Translation of 14.13	
21	14.14	iPhone E-mails reflecting use of <u>romariogro1@mail.ru</u> address	
22	14.14a	Translation of 14.14	
23	14.15	Photographs from iPhone	
24		Business Records	
25	15.1	Grandbury List of IP Addresses	
26	15.1a	Grandbury 902 Cert	
27	15.2	Western Union Wire Transfer Records	
28	15.2a	Excerpt of Exhibit 15.2	
	15.2b	Western Union 902 Cert	
	15.3	Reserved	
	15.3a	Reserved	
	15.4	Black Lotus Subscriber Records	
	15.4b	Black Lotus 902 Cert	
	15.5	PayPal Records for Account number *****4042	
	15.5a	PayPal 902 Cert	
	15.6	Reserved	
	15.7	Red Pepper Invoice for New POS System	
	15.8	FDIC Certificates	
	15.8a	Certificate of Proof of Insured Status for FDIC Certificates	
	15.9	NCUA Certificates	
	15.10	Reserved	
	15.11	Cloudflare Records of 2pac.cc account	
	15.11a	Cloudflare 902 Cert	

1	15.12	Grand Central Banking Business Records—Notice of Bank of America Fine	
2	15.13	BOP Trulincs Contact List	
3	15.13a	BOP 902 Cert	
4	15.14	NuSphere Records	
5	15.15	NuSphere 902 Certification	
6	15.16	Broadway Grill Records	
7	15.17	BECU Records for David Knoernschild	
8		Other	
9	16.1	Photos of Seleznev wedding with Gaponov	
10	16.2a	Cesar Carranza Laptop (Bulk Exhibit)	
11	16.2	nCuX111 chat with ubuywerush re – purchase of MSR206	
12	16.3	nCuX111 chat with ubuywerush re – Hi this is nCuX	
13	16.4	nCuX111 chat re Western Union to Thailand - Liudmila Bochkareva	
14	16.5	Forensic Artifacts from 2pac.cc server	
15	16.6	Loss Summary	
16	16a	Financial Institution Victims	
17	16b	Summary of Bank Specific Losses	
18	16.7	Screenshot From Spravku.Net	
19	16.7a	Translation of 16.7	
20	16.8	Reserved	
21	16.9	Reserved	
22	16.10	Forensic Evidence Extract: Cleveland Drive	
23	16.11	Reserved	
24	16.12	Summary of Victim IP Addresses	
25	16.13	Screenshots From Omerta Website	
26	16.14	Summary of Travel From Passport	
27	16.15	Chats Between Special Agent Wojcieszek and Track2	
28		Demonstrative Exhibits	
	17.1	Sample Credit Card	
	17.2	MSR 206 (Bulk Exhibit)	
	17.3	List of Translations Reviewed for Accuracy by Andrei Medvedev	
	17.4	Global Map With Relevant IP Addresses	
	17.5	Point of Sale System Diagram	
	17.6	Diagram of Track2 Infrastructure	
	17.7	Diagram of Track2 Infrastructure with email accounts	
	17.8	Sample Encase Evidence Pane Screen Shot	
	17.9	Diagram of Track2 Infrastructure with Victims	

1 DATED this 11th day of August, 2016.

2 Respectfully submitted,

3 ANNETTE L. HAYES
4 United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on August 11, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the attorneys of record for the defendant.

s/Janet K. Vos

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